

Evan J. Spelfogel
 Robyn Ruderman
 Epstein Becker & Green, P.C.
 250 Park Avenue
 New York, New York 10177-1211
 (212) 351-4500
 Attorneys for Defendant
 UNITED STATES DISTRICT COURT
 DISTRICT OF MASSACHUSETTS

-----	X	
LUANN P. GOULD,	:	
	:	05 CV 11118 (PBS)
Plaintiff,	:	
	:	
— against —	:	(ECF FILING)
	:	
LUCENT TECHNOLOGIES, INC.,	:	
	:	
Defendant.	:	
	:	
-----	X	

**DEFENDANT’S AMENDED MOTION TO
 MODIFY THE SCHEDULING ORDER**

With the consent of Plaintiff’s counsel, Robert Thomas and Linda Harvey, the defendant, Lucent Technologies, Inc., through the undersigned counsel, moves to modify the current Scheduling Order by seeking a three-week extension of time to complete its motion for summary judgment, which is currently due on July 28, 2006.

This extension of time is being requested because of scheduling conflicts and the unavailability of all necessary individuals to review the papers. We respectfully request that the new date for the motion be August 18, 2006, which will provide ample time for our client to review and sign all applicable papers.

This is the first request for a modification of this time limitation for defendant’s motion for summary judgment, and this request does not affect any other deadlines provided in the scheduling order.

Plaintiff counsel, Linda Harvey, Esq. has consented to this request.

EPSTEIN, BECKER & GREEN, PC

By: 

Evan J. Spelfogel

Robyn Ruderman (admitted pro hac vice)

250 Park Avenue

New York, NY 10017

(212) 351-4500

Attorneys for Defendant

Dated: July 19, 2006